

REMARKS

This Response, submitted in response to the Office Action dated June 24, 2008, is believed to be fully responsive to each point of rejection raised therein. Accordingly, favorable reconsideration on the merits is respectfully requested.

Claims 1-10, 12-36 are all the claims pending in the application. Applicant thanks the Examiner for indicating that claims 1-10 and 13-17 and 19 are allowed. Claims 12, 18 and 20-36 currently stand rejected.

Claim Rejections - 35 U.S.C. § 103

Claims 12, 18 and 20-36 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Chen (European Patent Application No. 859,500, hereinafter “Chen”) in view of Appelt et al., (US 2003/0078766, hereinafter “Appelt”) in view of Lau (US 6,850,766, hereinafter “Lau”). Applicant respectfully requests withdrawal of this rejection.

The Examiner correctly concedes that Chen and Appelt do not teach or suggest all the features of the claimed invention. The Examiner cites Lau to make up for these deficiencies. More specifically the Examiner points to Lau in the rejection of claims 12, 18, 22, 24, 27, 29, 30, 32 and 34. Applicant submits herewith, a certified translation of the priority document of the present Application. The priority date for the present Application is March 15, 2000. Please see Appendix A.

The filing date of the Lau is Apr. 25, 2001. Additionally, the date of the filing of the related provisional applications is April 26, 2000, which is after the priority date of the present Application. Please see Appendix B. Accordingly, Applicant submits that with Lau removed as

a cited reference, Chen and Appelt do not teach or suggest all the features of the claimed invention. Accordingly, claims 12, 18 and 20-36 are believed to be allowable.

Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



Carl J. Pellegrini
Registration No. 40,766

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE
23373
CUSTOMER NUMBER

Date: September 24, 2008